

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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KRISTOPHER R. OLSON,	:	
CHRISTOPHER LOPEZ, WARREN	:	
BARBER, CHRISTOPHER CLIFFORD	:	
and ERIK LIPTAK,	:	
	:	
Plaintiffs,	:	
v.	:	20 Civ. 632 (JSR)
	:	
MAJOR LEAGUE BASEBALL; MLB	:	
ADVANCED MEDIA, L.P.; HOUSTON	:	
ASTROS, LLC; and BOSTON RED SOX	:	
BASEBALL CLUB, LP,	:	
	:	
Defendants.	:	
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DECLARATION OF JOHN L. HARDIMAN

I, John L. Hardiman, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

1. I am a partner of Sullivan & Cromwell LLP, attorneys for Defendants Major League Baseball and MLB Advanced Media LP in this action, and a member of the Bar of the State of New York. I make this Declaration to place before this Court certain documents served in this action that are referenced in Major League Baseball's Memorandum of Law in Support of Its Motion for a Protective Order.

2. Attached hereto are true and correct copies of the following documents:

Plaintiff's First Set of Requests for Production of Documents from Defendant Major League Baseball	Exhibit 1
Defendants Major League Baseball and MLB Advanced Media L.P.'s Responses and Objections to Plaintiff's First Set of Requests for Production of Documents	Exhibit 2

Dated: March 30, 2020
New York, New York.

/s/ John L. Hardiman

John L. Hardiman